

HOYER & HICKS
Richard A. Hoyer (SBN 151931)
rhoyer@hoyerlaw.com
Ryan L. Hicks (SBN 260284)
rhicks@hoyerlaw.com
4 Embarcadero Center, Suite 1400
San Francisco, CA 94111
tel (415) 766-3539
fax (415) 276-1738

WALTER L. HAINES, ESQ. (SBN 71075)
UNITED EMPLOYEES LAW GROUP, P.C.
5500 Bolsa Ave., Suite 201
Huntington Beach, CA 92649
Tel.: (562) 256-1047
Fax: (562) 256-1006
whaines@uelglaw.com

Attorneys for Plaintiff
WYATT COPPERNOLL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

WYATT COPPERNOLL on behalf of all
others similarly situated,

Plaintiff,

vs.

HAMCOR INC.,

Defendant,

Case No. 3:16-cv-05936-WHA

**STIPULATION REQUESTING LEAVE
TO FILE AMENDED COMPLAINT AND
~~PROPOSED~~ ORDER THEREON**

WHEREAS, Plaintiff WYATT COPPERNOLL filed his Complaint in this Court on
October 13, 2016 (ECF Doc. #1);

STIPULATION REQUESTING LEAVE TO FILE AMENDED COMPLAINT

1 WHEREAS, in an effort to avoid burdening the Court with unnecessary motion
2 practice, Plaintiff has requested Defendant stipulate that Plaintiff be given leave to file his
3 Proposed First Amended Complaint (attached hereto as Exhibit 1) to add a claim asserting
4 violation of California Labor Code § 226.2, based on the same underlying allegations that
5 gave rise to his claim for unpaid wages; and

6 WHEREAS, upon leave being granted and the filing of Plaintiff's Amended Complaint,
7 Defendant shall have 14 days after the filing of the First Amended Complaint to respond
8 thereto.

9
10 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties that:

- 11 1. Plaintiff shall have leave to file the Amended Complaint attached hereto as Exhibit
12 1;
13 2. Upon Plaintiff filing the Amended Complaint (Exhibit 1), Defendant shall have 14
14 days after the filing of the Amended Complaint to file any response thereto; and
15

16 IT IS SO STIPULATED AND AGREED.

17 Date: February 3, 2017

HOYER & HICKS

18 /s/ Ryan L. Hicks

Richard A. Hoyer

Ryan L. Hicks

Attorneys for Plaintiff

WYATT COPPERNOLL

1 Date: February 3, 2017

FINE, BOGGS, and PERKINS

2
3 /s/ Roman Zhuk

4 Roman Zhuk
Attorneys for Defendant
HAMCOR, INC.

5
6 **~~PROPOSED~~ ORDER**


7 Pursuant to the stipulation of the parties and good cause appearing therefore, the
8 Court hereby Orders:

9 3. Plaintiff shall have leave to file the Amended Complaint attached to the parties'
10 stipulation as Exhibit 1; provided that it is filed as a separate ECF entry;

11 4. Defendant shall have 14 days after the filing of the Amended Complaint to file any
12 responses thereto.

13 IT IS ORDERED.

14
15
16 Date: February 6, 2017

17 
Hon. William H. Alsup
United States District Judge

ATTESTATION OF E-FILED SIGNATURE

I, Ryan L. Hicks, am the ECF User whose ID and password are being used to file this Stipulation. I hereby attest that Roman Zhuk has read and approved this Stipulation and consents to its filing in this action.

Date: February 3, 2017

HOYER & HICKS

/s/ Ryan L. Hicks

Richard A. Hoyer

Ryan L. Hicks

Attorney for Plaintiff

WYATT COPPERNOLL